

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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	:	07-CV-8383 (LAP/HP)
EQUAL EMPLOYMENT OPPORTUNITY	:	
COMMISSION,	:	ECF ACTION
	:	
Plaintiff,	:	
	:	DECLARATION OF HANNAH
v.	:	M. BRESHIN IN SUPPORT OF
	:	DEFENDANT'S MOTION TO
BLOOMBERG L.P.,	:	EXCLUDE THE REPORTS AND
	:	TESTIMONY OF DR. EUGENE
Defendant.	:	BORGIDA

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	:
	:
JILL PATRICOT, TANYS LANCASTER,	:
JANET LOURES, MONICA PRESTIA,	:
MARINA KUSHNIR and MARIA	:
MANDALAKIS,	:
	:
Plaintiff-Intervenors,	:
	:
v.	:
	:
BLOOMBERG L.P.,	:
	:
Defendant.	:

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1. I, Hannah M. Breshin, declare pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

2. I am a member of the law firm Jones Day, counsel for Bloomberg, L.P. ("Defendant or "Bloomberg"), Defendant in the above-captioned matter, and I submit this Declaration in support of Defendant's Motion to Exclude the Reports and Testimony of Dr. Eugene Borgida.

3. Attached as Exhibit A is a true and correct copy of relevant portions of the transcript from Dr. Eugene Borgida's deposition, taken on December 15, 2009.

4. Attached as Exhibit B is a true and correct copy of *Gosho v. U.S. Bancorp Piper Jaffray, Inc.*, No. C-00-1611-PJH, Order re: Motions to Strike Expert Opinion Testimony (N.D. Cal. Oct. 1, 2002), which is cited in Defendant's Reply Memorandum in Support of Defendant's Motion to Exclude the Reports and Testimony of Dr. Eugene Borgida.

Executed on June 25, 2010.

A handwritten signature in black ink, appearing to read 'H. Breshin', is written above a horizontal line.

Hannah M. Breshin